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Ser 1811GM/L3109  
3 Dec 1992

Mr. Chein Kao  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710

Subj: MINUTES OF MEETING REGARDING DATA VALIDATION FOR PHASES 1  
AND 2A REMEDIAL INVESTIGATION/FEASIBILITY STUDY (RI/ES) AT  
NAS, ALAMEDA

On Tuesday, November 24, 1992, representatives of the Navy, PRC, and JM Montgomery (JMM), met at the Berkeley office of the DTSC at the request of Mr. Chein Kao. The meeting was called by Mr. Kao to discuss data validation issues concerning the quality of the field sampling analyses performed by Canonie Environmental Services Corp. (Canonie) during their 1990 investigation of the Phases 1 and 2A remedial investigation/feasibility study (RI/FS) sites at Naval Air Station (NAS) Alameda.

#### Background

During early preparation of the draft Phases 1 and 2A data summary report (DSR) by the Navy's current contractor (PRC and JMM), it was brought to the DTSC's attention on June 2, 1992, that the hard copy data validation packages received from Canonie were incomplete, and that until complete data sets were acquired, delivery of the draft Phases 1 and 2A DSR would be delayed. It was agreed that the Navy would press Canonie for the missing data so as to complete the draft DSR as soon as possible. The Navy contacted Canonie on this issue and requested the missing data by early July. Canonie was asked to forward their electronic (computer-archived) copy of the same data, and most of this electronic data base was received in late July.

The PRC team began cross-comparisons of the hard copy data with that shown in the electronic data base and found that substantial discrepancies between the two sets of data exist. This information was conveyed through the NAS Alameda Monthly Status Reports starting in August. Additionally, the quality control (QC) data normally generated during the performance of chemical analyses conducted using US EPA protocols under SW-846, were incomplete. QC data that were found are not complete enough to perform data validation that would be comparable to those performed on the data generated during the Phases 2B and 3, and Phases 5 and 6 field investigations. In PRC team conversations with Mr. Jim Babcock of Canonie, Mr. Babcock indicated that Canonie had provided all the data validation information it had in its possession, and that the type of information provided was all that was required under EPA protocols and under the terms of the contract with the Navy at the time the Canonie work was performed.

On October 19, 1992, the PRC team suggested possible courses of action related to (1) retrieving the missing data from Canonie (assuming it exists), (2) to possibly resampling the missing data points, and (3) concerning generation of the draft DSR for DTSC review (though without the data being validated). The Navy concurred that in order to meet the DTSC delivery date of December 7, 1992, the PRC team should proceed to generate the draft DSR without validated data. It was also agreed that the DTSC would be contacted to discuss the useability of the non-validated data for future risk assessment work and for assessing the data gaps at the Phases 1 and 2A sites.

On November 19, 1992, the Navy and the PRC team held a conference call to discuss the format of the upcoming draft DSR with Ms. Virginia Lasky and Mr. Tom Lanphar, both of the DTSC, to discuss that the report would revolve around the data as reported, but not validated. It was tentatively agreed at that time that the DTSC would receive and review the draft DSR, and then would meet with the Navy on December 16, 1992, to discuss the suitability of the data for risk assessment and for identifying data gaps at the Phases 1 and 2A sites. On November 20, 1992, Mr. Kao requested an earlier meeting to discuss the data validation issue before the draft DSR is generated for DTSC review.

#### November 24, 1992 Meeting at DTSC

The following key points and resulting action items were discussed:

1) Mr. Kao informed Navy that if the existing Phases 1 and 2A data could not be validated, that at a minimum, all non-detect data points would require resampling. All data points with "hits" would require additional delineation and confirmation.

Action Item: Mr. Kao requested that the Navy and the PRC team provide him with a written chronology of the events concerning this matter..

2) Mr. Kao indicated that he would not review the draft DSR if the data were not validated in the report. The Navy and the PRC team pointed out that the draft DSR was already written and was due to the Navy for their review on November 30, 1992. The PRC team suggested that DTSC review of the data still could be made since the data presented was still usable for qualitative assessment and would be necessary for assisting in the development of the additional Phases 1 and 2A scope of work (SOW).

Action Item: Mr. Kao requested that he receive a debriefing on the content of the draft DSR on Tuesday, December 1, 1992, at 1 PM. The Navy agreed to be present and to provide a copy of the draft DSR for concurrent review. The PRC team will present a summary of the report on that date. A follow-up meeting was tentatively scheduled for Monday December 7, 1992 at 9 AM at the DTSC to review any specific comments on the document, and to begin assessing the additional Phases 1 and 2A scope of work. The DTSC requested to participate in the development of the Phases 1 & 2A SOW.

3) Mr. Munekawa indicated that Mr. Babcock of Canonie was interested in meeting with the Navy to further discuss the data validation issue, and Mr. Kao requested that the Navy pursue recovery of the required QC data.

4) Mr. Kao stated that Ms. Lasky was no longer involved with the NAS Alameda RI/FS project, that Mr. Tom Lanphar would be replacing her on the project, and that all future correspondence be addressed to Mr. Lanphar.

5) Mr. Kao requested that Navy still meet with DTSC on January 27, 1992, to formally adopt the overall RI/FS schedule so that mutually agreed target dates could be set, and entered into the DTSC computer tracking system.

List of Attendees:

<u>Name</u>	<u>Company</u>	<u>Telephone</u>
Chein Kao	DTSC	510-540-3822
Louise Lew	US Navy - WESTDIV	415-244-2556
Gary Munekawa	US Navy - WESTDIV	415-244-2524
George Kikugawa	US Navy - WESTDIV	415-244-2559
Michael Petouhoff	NAS Alameda	510-263-3726
Duane Balch	PRC-EMI	916-852-8300
Kenneth Leung	JM Montgomery	510-975-3460
Diana Martin	JM Montgomery	510-975-3400

If you have any questions regarding this matter, please contact either Mr. Gary J. Munekawa, Code 1811GM, (415) 244-2524 or Mr. George Kikugawa, Code 1811GK, (415) 244-2559.

Sincerely,

LOUISE T. LEW  
Head, Installation Restoration Section

Copy to:

California Regional Water Quality Control Board (Attn: Janette Baxter)  
NAS Alameda (Attn: Lt. Mike Petouhoff)  
NADEP Alameda (Attn: Paul Pentony)  
PRC Environmental Management, Inc. (Attn: Duane Balch)  
James M. Montgomery Consulting Engineers, Inc. (Attn: Ken Leung)

Blind Copy to:

18, 181, 1811, 1811GM, 1811G  
09CMN, 0222LC, Admin Record (3 copies)  
WRITER: Gary J. Munekawa/1811GM/X-2524  
Chron, Blue, Pink, Green  
File: NAS Alameda

**PROGRESS REVIEW MEETING  
REMEDIAL INVESTIGATION/FEASIBILITY STUDY  
NAVAL AIR STATION, ALAMEDA**

**28 NOVEMBER 1990  
(see Attachment 1 for Agenda)**

<u>Attendees</u>	<u>Affiliation</u>	<u>Telephone</u>
Mark Malinowski	DHS	(415)540-3816
Randy Cate	NAS Alameda	(415)263-3716
Ernie Galang	WESTDIV	(415)244-2560
Bella Dizon	WESTDIV	(415)244-2564
Steve Newton	J. M. Montgomery	(415)975-3400
Timothy Bodkin	Canonie	(415)573-8012
Kirk Switzer	PRC Environmental Mgmt.	(916)852-8300

**MINUTES**

**Phase 2A -- Report by Tim Bodkin**

1. Barrels need to be labeled; also waiting on pallets.
2. Summary reports have been delivered for sites CANS C-2, Area 97, Bldg. 316, and Bldg. 547.
3. Bella has geotechnical results for Phase 2A.
4. TCE detected at Bldg 316 in soil and ground water.
5. Soil gas hits at Bldg. 547; TPH and BTEX detected in ground water.
6. The DHS Hazardous Materials Lab (Bart Simmons and Stan Yeto) is reviewing the initial Phase 2A data for Bldg. 360.

**Phase 5 (SWAT) -- Report by Steve Newton**

1. Steve reported on the status of field activity for the month of November as summarized on the status report (attachment 2) he distributed at the meeting.

**Consistency Determination (BCDC) -- Report by Randy Cate**

1. BCDC evaluates the impacts of any drilling within 100 feet of the high-tide mark (6.1 feet MSL).
2. Randy will submit to the BCDC the information required to satisfy their permit application for all wells along the bay at both landfills by next week. BCDC will do an internal review and then respond by phone.
3. JMM will stake contingency holes in the event M-19 and M-15 are delayed by BCDC.
4. Not allowed to dispose in the landfill unless below TTLC and STLC. JMM to do a volume estimate and submit it to Randy Cate. Mark Malinowski suggested talking to the water board about disposal in the WB landfill or along the estuary. Randy Cate will pursue locating a site.

**CTO 107 and Other Work at NAS Alameda -- Report by Bella Dizon**

1. Bella has funding for CTO 107 and it must be awarded by December 31, 1990 (because is must be funded with first quarter money).
2. Phase 4 to begin in January 1991.

#### Abandonment of Existing Wells at Landfills -- Report by Kirk Switzer

1. Kirk presented PRC's tentative proposal to abandon the wells by removing the casing with a backhoe and then grouting without removing the filter pack material.
2. Mark indicated that he still wants the wells drilled out unless we can show that the wells are in the fill only and do not extend through the bay mud. If we can show this, then Mark says it will be acceptable to perforate the casings and then pressure grout. Only if the wells penetrate the bay mud (connect the two aquifers) should they be drilled out. This will result in the need to characterize the cuttings.
3. Bella tasked PRC to research the issue in item (2) and finalize the field work plan for well abandonment (No due date set although PRC should begin working on the question right away).

#### Comments on Environmental Sampling -- Report by Mark Malinowski

1. NOAA -- no response yet from Chip Demarest.
2. DOI -- Bill Allen has responded to Mark
3. Mark Malinowski requested that Bella issue a separate CTO for environmental sampling and not incorporate into the CTOs for the other phases.

#### Data Validation

1. Data validation is not required for Phases 1 and 2A. However, approximately 1-2 % of the samples had data validation packages prepared, but the validation review was not performed.
2. Data validation for Phase 5 will be reduced from 20 % to 10 %.

#### Summary Tables of Analytical Results (Areas of Concern)

1. Canonie will look into ways to highlight data presentation to indicate where values are above action levels.
2. Jmm wants to work with Canonie to come up with a compatible data base.

#### Soil Sampling of Deep Wells

1. For Phase 5, the work plan calls for continuous sampling to 50 feet, then in 5-foot increments thereafter. Mark Malinowski indicated a preference for continuous sampling throughout.

#### Building 5/Building 360 Testing

1. Mark Malinowski discussed adding one or more borings to the Bldg. 5 IR program to cover closure of a small area in the southeast corner of building 5. This is more sample locations than described in the work plan, but Bella indicated that she would consider add two more borings to the Building 5 RI scope of work.
2. Randy Cate will do the sampling at Building 360. A revised closure plan has been submitted by Randy Cate. He thought the closing date would be March or April 1991. Mark wants to be able to sample as soon as the building is vacated. Bella plans to issue a separate CTO to PRC for this work.

01/07/93

22:56

NAS ALAMEDA FMO

002

11:00 pm?!

George Jm  
George AK  
Geo- plr. Ret. - '61m

## Memorandum

1/7/92  
23

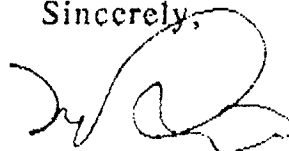
FM: LT Mike Petouhoff, NAS, Alameda Environmental Officer

TO: Gerry Katz

Subj: DERA Funding

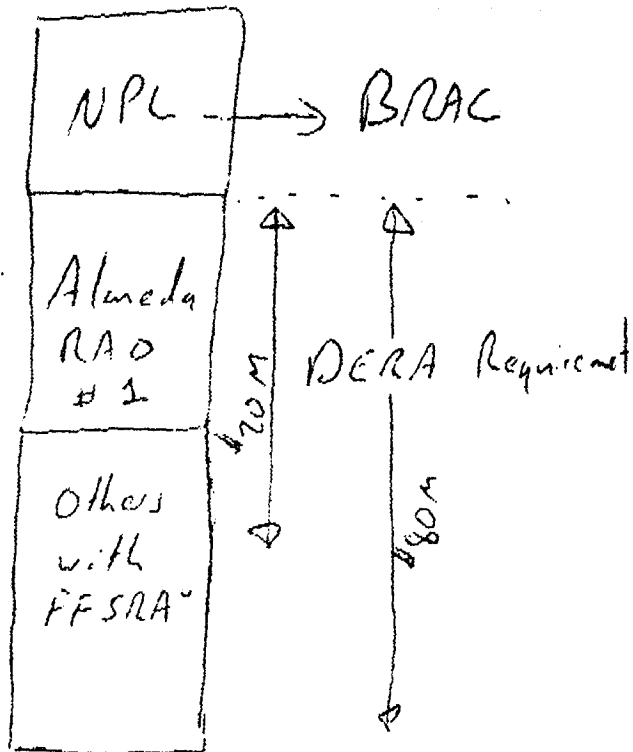
1. I appreciated the opportunity to address our concerns today. It looks like Alameda is ready to move ahead.
2. The two NPL sites under federal oversight are funded separately from DERA. The State has made clear that their 1988 RAO given to NAS Alameda represents the highest priority under their cognizance, so NAS Alameda is the #1 activity on the WESTDIV DERA funding list. As our FY93 requirements are below \$20M, the Alameda FY93 IR Program should be fully funded.
3. That looks like a green light to put together a schedule agreement by the end of January as required by the RAO and as DTSC has requested. Tom Lanphar indicated after a meeting we had this morning that Chen Kow left his meeting at WESTDIV last week feeling comfortable the Alameda IR program can be considered funded. We've got a lot of work ahead with your Alameda RPM's to execute CTO's in a timely fashion.
4. Unfortunately, the DERA shortfall may mean cuts in the programs at other DERA funded activities, and perhaps it may be even be appropriate that some of the lower priority sites at Alameda be deferred to ease impact at other installations. However, judging from the disproportionate cuts taken by WESTDIV ( $20/80=.25$   $296/375=.80$ ) a strong reclame to NAVFAC should be considered. Let us know if we can help in putting one together or in getting fleet support.

Sincerely,



Michael Petouhoff

→ Copy to: LOUIS LEW

WHAT ISWHAT WAS

- ① Priorities A-L
- ② OOPS we forgot Alameda